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Reductions in Force are the rule, (not increases)

For the past ten years organizations have been surviving by having “reductions in force”, by “downsizing” and “right sizing”. Now, FIA is proposing an “increase in force”. Apparently, to **ups**ize is to “**right**” size. What parallel universe is FIA living in?

The economy/market

At a time when the child care industry is dying on the vine due to a shrinking market, changing demographics, and a lousy economy; in a market in which workers at the low end of the wage scale are having more difficulties just finding work, along comes the State to pass measures which would drastically increase costs, (even if one quotable FIA source denies this), and then goes even further to, not only eliminate future jobs, but worse yet, to drive existing employees into the streets by imposing expensive additional training requirements on them. Then to add insult to injury, the state decides to give special dispensation to one of our main competitors by exempting them from the proposed stricter ratio regulations. This would be like the government telling Ford that they did not have to abide by the requirements for seat belts, airbags, emissions, or fleet mileage because they had a different styling philosophy than GM or Chrysler. I can only guess at the make up of this panel.

Every time the news carries a story about a child being locked in a day care center, or about some heinous crime committed in a day care *home*, I just know that all centers will be the target of new stricter regulations. As if writing tougher rules will stop these infractions. By imposing stricter regulations on all centers apparently FIA believes it will improve the level of care for “the children”. This group should be focusing on the laxness of licensed day car **homes** and then concentrate on finding the multitudes of **UNLicensed day care homes**. Compared to the strict building codes for centers, and the lack of specific codes for the average home, by definition, compared to a center, any home is a fire trap. Then there's the fact that a home is more open to the “comings and goings” of strangers, such as the friends of the children who live there. So why the continuous effort to tighten the screws on all centers? Could it be that they are so easily accessible, and the homes are not? Is it that they are easy targets, and that tightening rules on centers gives the impression that something constructive is being done by FIA?

Education and better care

Regarding the increased educational requirements being proposed, where's the proof tying increased educational classes to improved level of care? We certainly haven't seen it. None of the people we had working for us who had 4 year degrees in early childhood education programs from the best college in the state, could hold a candle to people holding only CDA's or even those with no prior experience or education. On the job training is the only program that we have found to be successful. Could the colleges be behind this one?

Ratios and better care

Regarding the proposed stricter teacher to child ratios, where is the proof that implementing stricter ratios will result in better care? Michigan already has some of the strictest ratio requirements in the country. Is it a race to compete with the other states? Is it that Michigan can't be “only just as tough as other states...we have to be tougher”. Is Michigan a panacea for employers? The number of businesses fleeing the state would indicate otherwise.

Playground Requirements. We have a 3 acre setting with many trees and a walking path .See {photos} This is not a chain with a small play area with no protection from the sun We have three different play areas all with permanent structures, (not the little Tykes kind that sit on top of the ground). We invested substantial amounts of money to provide many more play events than were required. Now we are told that we have to comply with stricter standards and make needless changes when we can least afford it. What about centers which use public parks? What control does CIS have over municipalities that do not make these changes? Will they close down those centers that depend on these parks...I doubt it. Is a child enrolled at one of these centers any less important?

Changes in number of allowable infant/toddlers per Room.

FIA is proposing that only 12 Infant/Toddlers may be in one room. FIA would have children in chopped up rooms instead of open rooms where they can see many things and be better supervised by many care givers rather than just one. Our center was designed to be open. We want parents and staff to be able to see what is being done in every area by just standing at the door. We have cameras to aid the director while she is in the office. Typically, a child is at a center for many hours each day. Why should they be restricted to looking at the same 4 walls and the same care giver all day long? Our infant/toddler room is 2000 sq ft. It is licensed for 40 babies. It functioned very well for many years at full capacity. We now run with 20 babies. It is designed to offer varying stimuli. The windows are purposely low, so that children can look out to see the park like setting. The care givers are constantly aware of whether another caregiver needs help. It's a team effort to care for all of the children. If we have to add partitions, then we will also, due to your fire rules, have to add a door for every new room created. We currently have two exits at grade. We typically evacuate the room in 30 -45 seconds. Now FIA proposes to chop it up, add expense, and make it even more complicated to operate. Yet you allow 12 children in a Day Care home. Show me a home that can be this well supervised. See Photos.

Do some real good for centers- eliminate witch hunt

It's time that FIA, instead of trying to put private child care providers **OUT** of business, to try to help providers stay **in** the child care business. If FIA really wants to help, it should try taking the witch hunt out of the complaint process, and please don't fall back to the old platitude that "it's to protect the children." A witch hunt is a witch hunt. When literally any individual can pick up a phone, publicly slander our good name by accusing us of child abuse, and remain totally anonymous, with not so much as a sworn statement or an affidavit, that's a witch hunt. And then to publish the resulting slanderous and unproven report on the government website is the final straw; as if parents weren't skittish enough already. And this is assuming that a center gets one of the better licensors, (consultants), which is, sadly, only about a 50-50 proposition. The state just can't be tough enough on those horrible indecent day care providers - they just don't deserve an even break. Take this process out of the middle ages and into at least the 18th century. Why doesn't FIA correct this travesty?? Maybe it's because if a complainant was required to provide you with a name, your case loads would be about 50% of what they are now. Would this require even fewer licensors? I think maybe so. I can't register an anonymous complaint with my builder, or my doctor, so why should I have to suffer through this horrible process because I am a day care provider. Again, I'm sure you will fall back on the tired argument that "it's to protect the children". There are plenty of child care centers in every community. Parents have choices; it's a very competitive market. They are not forced to subject their children to substandard centers; it's not as if they were living next to a suspected abuser, and feel the need for anonymity because they can not pick up and move. Our parents can leave at anytime and find other care within an hour.

Who stands to benefit?

Who benefits if we, the small private provider, goes away. Well, one has only to ask, "What institution has been steadily encroaching on our market for the last 10 years??" Answer: the public schools, (as if

they have done such an outstanding job with the age groups that they have been entrusted with). It's the public schools that have steadily used our tax dollars to put us out of business. Initially, they used buildings that were "idle anyway" telling us that it's better than letting them sit. They have umbrella insurance policies that we pay for (ever try to sue a public school?). They can offer better benefits to employees on our nickel. Then as they began to figure out that there is money to be made, they now are building new facilities, on our dollar, to further their efforts to put us out of business. The superintendent of one large school district near us routinely tells people that caring for preschoolers is HIS business. As if he ever ran a business on his own investment...

After the migration to public schools is completed, who really benefits. Not private providers, and probably not even FIA directly. However, could it be that increasing the number of public school employees increases the number of MEA numbers? Yes, we know that day care employees in the public schools may not *currently* be MEA members, but why not? Isn't it just a matter of time? Then there's the next question. Who does the MEA invariably support politically? I don't have to name names; we all know the answer to this.

We oppose these proposed changes. We also plan to voice our concerns to each member of the House Standing Committee on Family and Children Services.

Thank You



Dan Lenzi